



Lima Location
3820 S. Dixie Hwy
Lima, Ohio 45806

Toledo Location
19 N. Erie Street
Toledo, Ohio 43604

February 26, 2010

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36
Annual 64.2009(e) CPNI Certification for 2010
Date filed: February 26, 2010
Name of company covered by this certification: Virtual Technologies Group, Inc. & alias
Comm-Core
Form 499 Filer ID: **499 Filer ID Had Been Applied For**
Name of signatory: Chuck Greeley
Title of signatory: President

Dear Ms. Dortch:

I, Chuck Greeley certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47 C.F.R. S: 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in black ink, appearing to read "Chuck Greeley", is written over a horizontal line.

CPNI Compliance Statement and Operating Procedures of Virtual Technologies Group, Inc

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"),¹ Chuck Greeley, President of Virtual Technologies Group, Inc and affiliated entities makes the following statement:

Virtual Technologies Group, Inc has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Virtual Technologies Group, Inc is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize Virtual Technologies Group, Inc's policies and procedures designed to safeguard CPNI.

Virtual Technologies Group, Inc uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Virtual Technologies Group, Inc does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Virtual Technologies Group, Inc has established procedures to verify an incoming caller's identity. Virtual Technologies Group, Inc trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in Virtual Technologies Group, Inc's CPNI Manual. Virtual Technologies Group, Inc also limits the number of employees that have access to customer information and call data.

Virtual Technologies Group, Inc has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Virtual Technologies Group, Inc also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules. Virtual Technologies Group, Inc will track customer complaints regarding CPNI, notify its customers in accordance with the

¹ 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

Virtual Technologies Group, Inc has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

Virtual Technologies Group, Inc annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

Chuck Greeley

President